

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** John Conroy  
**Title:** Vice President

**REQUEST:** AT&T, Set #1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-1 Please provide in manipulable electronic form (e.g., an Excel spreadsheet) a table which sets forth the following information for each Verizon host or remote central office (“CO”) in the state of Massachusetts:

- (a) the 11-digit Common Language Location Identifier (“CLLI”) code of the switch as it appears in the Local Exchange Routing Guide (“LERG”);
- (b) the associated LATA number;
- (c) address, including City or Town;
- (d) the Metropolitan Statistical Area (“MSA”) within which the central office is located;
- (e) the UNE rate density zone within which the central office is located;
- (f) the total number of voice-grade equivalent lines served by Verizon’s switch on a DS0 voice grade equivalent basis;
- (g) the total number of UNE-L cross-connects in service in the CO;
- (h) whether the CO is staffed full time (i.e., during regular business hours), part-time (and if so, on what basis), or unstaffed;
- (i) the total amount of space in each CO currently being used by collocators; and
- (j) the total amount of space available for use by collocators (which does not include space reserved for Verizon or its

**Continued Page 2**

affiliates).

**REPLY:**

- (a) – (h) Please see attached Confidential Exhibit 1-1a-h. Verizon MA has provided the total number of UNE-Loops in service in the Massachusetts central offices in the attachment. All of the data for (f) and (g) is as of June 30, 2003. The data for (h) is as of November 1, 2003. The data contained in “MA ATT Exhibit 1-1a-h” is proprietary, confidential and competitively sensitive and is being provided to the Department and to parties in accordance with the terms of the Department’s Protective Order.
- i) Please see attached “MA ATT Exhibit 1-1i” detailing the total amount of space in each CO currently being used by collocators. The data contained in “MA ATT Exhibit 1-1i” is proprietary, confidential and competitively sensitive and is being provided to the Department and to parties in accordance with the terms of the Department’s Protective Order.
- j) The total amount of space available for collocation at any given time, in any given office, is difficult to determine due to the numerous variables that impact space availability. Providing this information would require a burdensome special study and would only be valid for a short period of time.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** Lynelle Reney

**Title:** Director – Customer Service

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-7

For each CO listed in response to 0, identify each collocation arrangement in that CO, by stating the following with respect to the collocation arrangement:

- (a) The name of the entity to which the collocation arrangement is provided;
- (b) The type of collocation arrangement (i.e. caged, cageless, virtual);
- (c) The size of the collocation arrangement (if virtual, the number of equipment frames);
- (d) The date on which the collocation arrangement was first provided, and the name of the entity to which it was provided;
- (e) The date on which the collocation arrangement was last augmented (if applicable);
- (f) Whether the collocation arrangement has ever been used for gaining access to Verizon's unbundled loops and, if so, whether it currently is being used for such purpose;
- (g) The number of Verizon loops, by type (e.g., analog UNE, DS-1 UNE, analog special access, DS-1 special access, etc.) provisioned to each such collocation arrangement during:
  - (i) second quarter, 2003
  - (ii) first quarter, 2003
  - (iii) fourth quarter, 2002
  - (iv) third quarter, 2002
  - (v) second quarter, 2002
  - (vi) first quarter, 2002

- (vii) calendar year, 2001
- (viii) calendar year, 2000; and

(h) The number of cross connects existing between Verizon's main distribution frame and the collocation arrangement as of the end of the following periods:

- (i) second quarter, 2003
- (ii) first quarter, 2003
- (iii) fourth quarter, 2002
- (iv) third quarter, 2002
- (v) second quarter, 2002
- (vi) first quarter, 2002
- (vii) calendar year, 2001
- (viii) calendar year, 2000

**REPLY**

a) Please see attached "MA ATT Exhibit 1-7." The attachment contains proprietary information and is being provided to the Department and to parties in accordance with the terms of the Department's Protective Order.

b) Please see attached "MA ATT Exhibit 1-7."

c) Please see attached "MA ATT Exhibit 1-7."

d) Please see attached "MA ATT Exhibit 1-7."

e) Please see attached "MA ATT Exhibit 1-7."

f) Verizon does not track the requested information by collocation arrangement, thus the requested information would require a burdensome special study. Verizon provides the capacity for CLECs to order voice grade services, including UNE loop services through collocation arrangements. The customer of record for UNE loops is the CLEC.

g) The information requested is not available for the time periods requested. In addition, Verizon MA objects to this request on the grounds that the question is overly broad and asks for information that is not relevant to the impairment analysis at issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

h) Please see attached "MA ATT Exhibit 1-7."

Cross connect data prior to 1<sup>st</sup> quarter 2003 is not available.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** Maryellen Langstine

**Title:** Director – Wholesale

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-8 Provide the number of loops, by calendar year and by central office (by applicable CLLI code), in Massachusetts that are served by:

- (a) IDLC arrangements;
- (b) NGDLC arrangements; or
- (c) UDLC arrangements.
- (d) Of the IDLC loops, please state how many loops are transferable to universal digital loop carrier (UDLC) without additional construction.

**REPLY:** Verizon is not able to provide the information as requested without an extensive manual study. However, Verizon is able to provide the number total number of lines serviced by digital arrangements by CLLI in Massachusetts. This is provided in “MA ATT Exhibit 1-8” attached hereto. The attachment contains proprietary information and is being provided to the Department and to parties in accordance with the terms of the Department’s Protective Order.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** John Livecchi  
**Title:** Director – Network Engineering

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-9 Provide a forecast for the next five years, or the longest available forecast if a five-year forecast is not available, identifying the number of loops in Massachusetts that Verizon intends to serve via:

- (a) IDLC loop arrangements.
- (b) NGDLC loop arrangements.

**REPLY:** Verizon MA objects to this request on the grounds that this type of forecast is not available and the information requested would require a burdensome special study or statistical sampling to determine an estimated figure. There are over one million distribution terminals in the Verizon MA network serving over four million access lines. The access lines are provisioned on copper, IDLC, and UDLC. Verizon MA expects that the percentage of new services provisioned on copper, IDLC and UDLC would be roughly equal to the percentages of each presently found in the Verizon MA network.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** John Livecchi

**Title:** Director – Network Engineering

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-10 Are there any customers being served via UNE-P today that could not be served via UNE-L (such as for reasons of no copper to replace UDLC, etc.)? If so, please identify the number of such customers by wire center or CLLI code. For the Verizon access lines that are currently provisioned on IDLC technology, please state the percentage of such access lines for which Verizon has existing, parallel copper or Universal Digital Loop Carrier (“UDLC”) facilities available for hot cut conversions.

**REPLY:** Any customer in Massachusetts being served via UNE-P today could be served by UNE-L, if requested. If neither a copper loop nor a loop served by UDLC were available, UDLC facilities would be constructed for the existing requested loop. In such a situation, additional charges will apply.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:  
Title:**

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-11 Please provide Verizon's variable costs, marginal costs, and forward-looking economic costs for local, long distance, and broadband services individually and as part of a bundled offering.

**REPLY:** Verizon MA objects to this request on the grounds that it seeks information that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Information regarding Verizon's retail operations is outside the scope of the FCC's mandatory "policy framework" that must be applied in this proceeding, which is based on "carefully targeted impairment determinations." *Triennial Review Order* ¶ 187. These determinations are premised on "granular evidence that new entrants are providing retail services in the relevant market *using non-incumbent LEC facilities*," not Verizon's retail operations. *Id.* ¶ 93 (emphasis added) Moreover, Information regarding operational and economic factors that are relevant to a potential deployment case is irrelevant to the question of whether Verizon has satisfied the applicable "trigger" – which is the only impairment determination that is at issue in this proceeding. *See Triennial Review Order* ¶ 425, n. 1300 (economic and operational factors that are used in a potential deployment case "come into play only if . . . [the FCC's] deployment triggers are not met.").



**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:  
Title:**

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-12 Please provide, chronologically by tariff filing date, a list of Verizon business and residential retail price or service changes for years 2002 and 2003 (to date) and, for each tariff filing, explain the services involved and the nature of the change (e.g., change in price, change in term, new bundle of services, etc.). Please include all state and federal tariffs under which service is offered in Massachusetts.

**REPLY:** Verizon MA objects to this request on the grounds that it seeks information that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Information regarding operational and economic factors that are relevant to a potential deployment case is irrelevant to the question of whether Verizon has satisfied the applicable “trigger” – which is the only impairment determination that is at issue in this proceeding. *See Triennial Review Order* ¶ 425, n. 1300 (economic and operational factors that are used in a potential deployment case “come into play only if . . . [the FCC’s] deployment triggers are not met.”). Moreover, information regarding Verizon’s retail operations is outside the scope of the FCC’s mandatory “policy framework” that must be applied in this proceeding, which is based on “carefully targeted impairment determinations.” *Triennial Review Order* ¶ 187. These determinations are premised on “granular evidence that new entrants are providing retail services in the relevant market using non-incumbent LEC facilities,” not Verizon’s retail operations. *Id.* ¶ 93 (emphasis added)

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:  
Title:**

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-13 Identify and describe any constraints (if any) on Verizon MA's ability to a) reduce prices in relation to some measure of cost (e.g., price floor based on TSLRIC); b) target price reductions to geographic areas; c) target price reductions to types of customers (including individual customers).

**REPLY:** Verizon MA objects to this request on the grounds that it seeks information that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Information regarding operational and economic factors that are relevant to a potential deployment case is irrelevant to the question of whether Verizon has satisfied the applicable "trigger" – which is the only impairment determination that is at issue in this proceeding. *See Triennial Review Order* ¶ 425, n. 1300 (economic and operational factors that are used in a potential deployment case "come into play only if . . . [the FCC's] deployment triggers are not met."). Moreover, information regarding Verizon's retail operations is outside the scope of the FCC's mandatory "policy framework" that must be applied in this proceeding, which is based on "carefully targeted impairment determinations." *Triennial Review Order* ¶ 187. These determinations are premised on "granular evidence that new entrants are providing retail services in the relevant market *using non-incumbent LEC facilities*," not Verizon's retail operations. *Id.* ¶ 93 (emphasis added)

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:  
Title:**

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-14 Produce all documents referring to or discussing any strategic behavior (*e.g.*, pricing offers, packaged or bundled service offerings, waiver of fees, term contract offerings) that Verizon has implemented or evaluated in response or potential response to one or more CLEC's planned or actual entry into a local service market, either: (a) in Massachusetts; or (b) in some other state.

**REPLY:** Verizon MA objects to this request on the grounds that it seeks information that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Information regarding operational and economic factors that are relevant to a potential deployment case is irrelevant to the question of whether Verizon has satisfied the applicable "trigger" – which is the only impairment determination that is at issue in this proceeding. *See Triennial Review Order* ¶ 425, n. 1300 (economic and operational factors that are used in a potential deployment case "come into play only if . . . [the FCC's] deployment triggers are not met."). Moreover, information regarding Verizon's retail operations is outside the scope of the FCC's mandatory "policy framework" that must be applied in this proceeding, which is based on "carefully targeted impairment determinations." *Triennial Review Order* ¶ 187. These determinations are premised on "granular evidence that new entrants are providing retail services in the relevant market *using non-incumbent LEC facilities*," not Verizon's retail operations. *Id.* ¶ 93 (emphasis added) Finally, the request is objectionable to the extent that it requires disclosure of information protected from discovery by the attorney-client privilege and/or the attorney work product doctrine.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:  
Title:**

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-15 On a wire center basis, please provide Verizon's average local revenue per retail small business line, per retail small business customer, per retail residential line, and per retail residential customer. If this information is not available on a wire center basis, please provide it on the next smallest geographic basis for which it is available. Please provide all backup upon which Verizon relied to calculate these amounts. Please provide the definition of small business customer that Verizon used in answering this question.

**REPLY:** Verizon MA objects to this request on the grounds that it seeks information that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Information regarding operational and economic factors that are relevant to a potential deployment case is irrelevant to the question of whether Verizon has satisfied the applicable "trigger" – which is the only impairment determination that is at issue in this proceeding. *See Triennial Review Order* ¶ 425, n. 1300 (economic and operational factors that are used in a potential deployment case "come into play only if . . . [the FCC's] deployment triggers are not met."). Moreover, information regarding Verizon's retail operations is outside the scope of the FCC's mandatory "policy framework" that must be applied in this proceeding, which is based on "carefully targeted impairment determinations." *Triennial Review Order* ¶ 187. These determinations are premised on "granular evidence that new entrants are providing retail services in the relevant market *using non-incumbent LEC facilities*," not Verizon's retail operations. *Id.* ¶ 93 (emphasis added)

VZ # 27

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:  
Title:**

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-16 Please provide Verizon's average "take rate" for vertical features for small business customers, and for residential customers.

**REPLY:** Verizon MA objects to this request on the grounds that it seeks information that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Information regarding operational and economic factors that are relevant to a potential deployment case is irrelevant to the question of whether Verizon has satisfied the applicable "trigger" – which is the only impairment determination that is at issue in this proceeding. *See Triennial Review Order* ¶ 425, n. 1300 (economic and operational factors that are used in a potential deployment case "come into play only if . . . [the FCC's] deployment triggers are not met."). Moreover, information regarding Verizon's retail operations is outside the scope of the FCC's mandatory "policy framework" that must be applied in this proceeding, which is based on "carefully targeted impairment determinations." *Triennial Review Order* ¶ 187. These determinations are premised on "granular evidence that new entrants are providing retail services in the relevant market *using non-incumbent LEC facilities*," not Verizon's retail operations. *Id.* ¶ 93 (emphasis added)

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts  
D.T.E. 03-60**

**Respondent:  
Title:**

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-17 Provide all internal documents that refer to, relate to, or discuss the profitability of Verizon using self-provided switching and unbundled loops leased from an ILEC to serve residential or business customers served by analog loops (hereinafter “mass-market customers”) in any out-of-region area, or that refer to or discuss any operational or economic obstacle Verizon has encountered in any effort Verizon has made to implement or expand its out-of-region local market entry strategy. For this purpose, “out-of-region” refers to geographic areas within the United States but outside of the areas within which Verizon is the incumbent local exchange carrier (“ILEC”).

**REPLY:** Verizon MA objects to this request on the grounds that it seeks information that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Information regarding operational and economic factors that are relevant to a potential deployment case is irrelevant to the question of whether Verizon has satisfied the applicable “trigger” – which is the only impairment determination that is at issue in this proceeding. *See Triennial Review Order* ¶ 425, n. 1300 (economic and operational factors that are used in a potential deployment case “come into play only if . . . [the FCC’s] deployment triggers are not met.”). Moreover, information regarding Verizon’s retail operations is outside the scope of the FCC’s mandatory “policy framework” that must be applied in this proceeding, which is based on “carefully targeted impairment determinations.” *Triennial Review Order* ¶ 187. These determinations are premised on “granular evidence that new entrants are providing retail services in the relevant market *using non-incumbent LEC facilities,*” not Verizon’s retail operations. *Id.* ¶ 93 (emphasis added)

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** Artie Zanfini  
**Title:** Director – Customer Service

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-18 Please provide UNE-Loop quantities provisioned by Verizon by wire center in Massachusetts for each quarter from January 2001 to the present, distinguishing between business and residence lines, and stating quantities separately for: (a) new CLEC customer lines, (b) pre-existing CLEC customer lines transitioning from total service retail, (c) pre-existing CLEC customer transitioning from UNE-P, (d) ILEC retail customer migration to CLEC, and (e) CLEC-to-CLEC migration.

**REPLY:** The information requested is not readily available and would require a special study that would entail an extensive, burdensome manual review. Verizon, however, does have the following data available in response to this request:

(a) Please see attached “MA ATT Exhibit 1-18a” detailing on a statewide basis for Massachusetts for the period January, 2002 through October, 2003, the number of lines on confirmed non-digital new UNE Loop orders. This count excludes confirmed orders that were subsequently cancelled at CLECs’ request (via “SUPP-1” orders). Verizon does not track this information by wire center. The attachment contains proprietary information and is being provided to the Department and to parties in accordance with the terms of the Department’s Protective Order.

(b) – (e) Please see “MA ATT Exhibit 1-18b” detailing on a statewide basis for Massachusetts for the period January, 2002 through October, 2003, the number of lines on confirmed UNE Loop with Number Portability orders. This count reflects hot cut migration orders and excludes confirmed orders that were subsequently cancelled at CLECs’ request (via “SUPP-1” orders).

Verizon does not track parts (b) through (e) separately, nor does Verizon track this information by wire center. The attachment contains proprietary information and is being provided to the Department and to parties in accordance with the terms of the Department's Protective Order.

VZ # 30



**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** Michael Willis  
**Title:** Manager - Wholesale

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-19 Please state for each quarter and each Massachusetts wire center:  
(a) the average number of unbundled loops provisioned by Verizon on a daily basis for the quarter, (b) the fewest number of unbundled loops provisioned in a work day during the quarter, and (c) the maximum number of unbundled loops provisioned in a work day.

**REPLY:** The information requested is not readily available and to obtain the data would require a special study that would entail an extensive, burdensome manual review.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** John Conroy  
**Title:** Vice President

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-21 Provide for each wire center in Massachusetts on a monthly basis the number of CLEC-served lines for which disconnects have been processed (Customer Service Provider Change or Other Reason), separated by UNE-P and UNE-L, and, if available, for each UNE-P and UNE-L category, further broken out between business and residential customers.

**REPLY:** Please see attached Confidential Exhibit 1-21. The attachment contains proprietary information and is being provided to the Department and to parties in accordance with the terms of the Department's Protective Order. The data is for residential and Business UNE-P disconnects on a statewide basis for the period January 2000-August 2003. The information is not readily available for UNE-L, or on a wire center basis without a special study.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** James McLaughlin  
**Title:** Executive Director-Operations

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-22 Has Verizon ever estimated, or communicated to any CLEC, the total number of cutovers Verizon is capable of performing per day per central office in Massachusetts, or for some geographic grouping or groupings of central offices in Massachusetts? If yes:

- (a) Provide the substance of those estimates or communications, including all documents discussing or concerning limitations on the number of hot cuts that can be performed. Please explain in detail the reasons for imposing these limits, and provide all documents describing or discussing the limits or the decision to impose them.
- (b) Please define and explain the areas (e.g., a manager's area) for which such limits are established, and explain the basis or reasons for these area definitions.
- (c) If there are differences in the maximum number of cutovers that can be performed in different central offices or geographic areas, please explain in detail the reasons for the differences.

**REPLY:** Verizon has not estimated or communicated to any CLEC the total number of cutovers Verizon is capable of performing using the Basic hot cut process. However, Verizon, working with the CLEC community, has developed guidelines related to the Project or Bulk Hot Cut process.

**REPLY: (cont'd)**

The general guidelines for a Project or Bulk Hot Cuts, developed collaboratively with CLECs during the creation of the Project process, state that a Project will be worked in one central office per manager's area, up to two central offices per geographic area, on a particular negotiated due date. A manager's area is defined as the region that includes the central offices supervised by a particular Verizon manager. The number of managers and geographic areas are typically determined by the physical size of the area and the number of lines in service in the central offices. A Project has a guideline of up to 150 cutover lines per central office per due date, though this number has been exceeded on a number of occasions based on the CLEC's requirements. If a CLEC requires significantly more than 150 lines, the Project process can be utilized on separately negotiated (typically successive) due dates. These guidelines, created to facilitate better resource utilization for both Verizon and the CLEC, could be revisited should the situation warrant it.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** Jennifer Sherman

**Title:** Manager – Customer Service

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-23 For each month since January 1, 2001, please provide the total number of loop cutovers by wire center that resulted in the loop being swung back to Verizon's switch, and also specify how many of these occurred within 10 days of the provisioning due date and how many occurred beyond 10 days of the provisioning due date.

**REPLY:** Please see attached "MA ATT Exhibit 1-23" showing the total number of UNE Loops, previously cut over to CLECs, which were subsequently cut back over to Verizon switches for service by Verizon. The attachment contains proprietary information and is being provided to the Department and to parties in accordance with the terms of the Department's Protective Order. Verizon has tracked the number of such orders starting in May 2001, and the number of lines starting in August 2002. Verizon does not track this data by wire center, nor does Verizon track how many occurred within 10 days of the provisioning due date. The requested information would require a special study.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:  
Title:**

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-24 Has Verizon considered deploying NGDLC arrangements that packetize both the voice and data services? If so, please describe all such alternatives considered and produce all documents that refer, concern, or discuss Verizon's deployment or potential deployment of NGDLC arrangements that packetize both the voice and data services.

**REPLY:** Verizon MA objects to this request on the grounds that it seeks information that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Information regarding operational and economic factors that are relevant to a potential deployment case is irrelevant to the question of whether Verizon has satisfied the applicable "trigger" – which is the only impairment determination that is at issue in this proceeding. *See Triennial Review Order* ¶ 425, n. 1300 (economic and operational factors that are used in a potential deployment case "come into play only if . . . [the FCC's] deployment triggers are not met."). Moreover, information regarding Verizon's retail operations is outside the scope of the FCC's mandatory "policy framework" that must be applied in this proceeding, which is based on "carefully targeted impairment determinations." *Triennial Review Order* ¶ 187. These determinations are premised on "granular evidence that new entrants are providing retail services in the relevant market *using non-incumbent LEC facilities*," not Verizon's retail operations. *Id.* ¶ 93 (emphasis added)

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:  
Title:**

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-25 What percentage of Verizon's copper facilities in Massachusetts has been retired, on a per line basis? Please provide the basis for your calculation, including the nature and sources of data used.

**REPLY:** Verizon MA objects to this request on the grounds that it seeks information that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Information regarding operational and economic factors that are relevant to a potential deployment case is irrelevant to the question of whether Verizon has satisfied the applicable "trigger" – which is the only impairment determination that is at issue in this proceeding. *See Triennial Review Order* ¶ 425, n. 1300 (economic and operational factors that are used in a potential deployment case "come into play only if . . . [the FCC's] deployment triggers are not met."). Moreover, information regarding Verizon's retail operations is outside the scope of the FCC's mandatory "policy framework" that must be applied in this proceeding, which is based on "carefully targeted impairment determinations." *Triennial Review Order* ¶ 187. These determinations are premised on "granular evidence that new entrants are providing retail services in the relevant market *using non-incumbent LEC facilities*," not Verizon's retail operations. *Id.* ¶ 93 (emphasis added)

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:  
Title:**

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-26 Describe with specificity Verizon's plans to retire any copper loop plant in Massachusetts. Please provide any documents describing such plans.

**REPLY:** Verizon MA objects to this request on the grounds that it seeks information that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Information regarding operational and economic factors that are relevant to a potential deployment case is irrelevant to the question of whether Verizon has satisfied the applicable "trigger" – which is the only impairment determination that is at issue in this proceeding. *See Triennial Review Order* ¶ 425, n. 1300 (economic and operational factors that are used in a potential deployment case "come into play only if . . . [the FCC's] deployment triggers are not met."). Moreover, information regarding Verizon's retail operations is outside the scope of the FCC's mandatory "policy framework" that must be applied in this proceeding, which is based on "carefully targeted impairment determinations." *Triennial Review Order* ¶ 187. These determinations are premised on "granular evidence that new entrants are providing retail services in the relevant market *using non-incumbent LEC facilities*," not Verizon's retail operations. *Id.* ¶ 93 (emphasis added)



**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:  
Title:**

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-27 Please describe with specificity the process Verizon uses in retiring copper loop plant. Please specifically include in your answer the notice Verizon provides to CLECs that provide service to customers using the plant and what options will be available to CLECs providing voice and/or DSL service to customers served by copper loop plant that Verizon plans to retire.

**REPLY:** Verizon MA objects to this request on the grounds that it seeks information that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Information regarding operational and economic factors that are relevant to a potential deployment case is irrelevant to the question of whether Verizon has satisfied the applicable “trigger” – which is the only impairment determination that is at issue in this proceeding. *See Triennial Review Order* ¶ 425, n. 1300 (economic and operational factors that are used in a potential deployment case “come into play only if . . . [the FCC’s] deployment triggers are not met.”). Moreover, information regarding Verizon’s retail operations is outside the scope of the FCC’s mandatory “policy framework” that must be applied in this proceeding, which is based on “carefully targeted impairment determinations.” *Triennial Review Order* ¶ 187. These determinations are premised on “granular evidence that new entrants are providing retail services in the relevant market *using non-incumbent LEC facilities*,” not Verizon’s retail operations. *Id.* ¶ 93 (emphasis added)

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** John Livecchi  
**Title:** Director – Network Engineering

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-28 Please provide the number of lines served by DLC in Massachusetts for which alternative copper loop facilities are currently not available.

**REPLY:** Verizon MA does not maintain data that would enable it to obtain the requested information without undertaking a burdensome manual special study.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** Jennifer Sherman  
**Title:** Manager – Customer Service

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-29 Please identify what percent of hot cut LSRs received by Verizon-Massachusetts in the last 12 months for which data are available have required a field dispatch to remove a customer from an access line(s) provisioned on an IDLC system. Please explain how you calculated or estimated the percentage and provide supporting work papers.

**REPLY:** Please see “MA ATT Exhibit 1-29” detailing the percent of hot cut LSRs received by Verizon-Massachusetts in the last 12 months for which data are available that have required a field dispatch to remove a customer from an access line(s) provisioned on an IDLC system. The attachment contains proprietary information and is being provided to the Department and to parties in accordance with the terms of the Department’s Protective Order.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** John Livecchi

**Title:** Director – Network Engineering

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-30 What percentage of access lines that Verizon currently provisions to CLECs in Massachusetts on a UNE-P basis are provisioned on IDLC systems?

**REPLY:** The data requested is not readily available and would require a burdensome special study. Verizon MA, however, expects that the percentage of UNE-P lines served on IDLC should not differ significantly from the overall percentage of lines served on IDLC in Verizon's network assuming a similar distribution of UNE-P lines and all lines across the network.

Approximately 16% of all lines in Massachusetts are IDLC lines

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:  
Title:**

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-31 Please describe with specificity the process by which CLECs providing voice service to a mass market customer utilizing its own switches together with unbundled loops leased from Verizon could add data service. Please provide the following information regarding the process:

- (a) Please state whether the process is mechanized or manual. If the process is mechanized, please state whether the service orders flow through the process without manual intervention. If orders do flow through, please state the percentage of the service orders that flow through to completion;
- (b) Please list the recurring and nonrecurring charges the CLEC would incur;
- (c )Please provide the average service outage experienced by the end user customer;
- (d) Please state whether the loop would be reused or whether new facilities would be provisioned;

Please state whether information in downstream databases, including 911, LIDB and directory listings would be impacted. If your answer is yes, please explain all such effects in detail.

**REPLY:** Verizon MA objects to this request on the grounds that it seeks information that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** Jennifer Sherman  
**Title:** Manager – Customer Service

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-33 Please identify any Massachusetts central offices in which Verizon has never performed a hot cut.

**REPLY:** Verizon MA is not able to directly identify all central offices in which hot cuts have never been performed. However, it is clearly the case that hot cuts have not been performed in offices in which no CLECs have ever been collocated. Offices with collocation arrangements currently in place are shown in the response to AT&T Information Request 1-7 above.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** Maryellen Langstine

**Title:** Director - Wholesale

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-34      How many separate cross-connections are typically required for Verizon to complete a hot cut on a:

- (a) Cosmic Distributing Frame?
- (b) Main Distributing Frame with Intermediate Distributing Frames?
- (c) Main Distributing Frame without Intermediate Distributing Frames?

**REPLY:**

- (a) three (2 connects and one disconnects)
- (b) four (two connects and two disconnects)
- (c) two (one connect and one disconnect)

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** John Conroy  
**Title:** Vice President

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-36      What percentage of access lines that Verizon currently provisions to CLECs in Massachusetts on a UNE-P basis are located in (1) staffed COs and (2) unstaffed COs? If these two numbers do not sum to 100 percent, please explain why. Please state the date that Verizon used when calculating the percentages.

**REPLY:**

- (1) Approximately 67% of access lines that Verizon currently provisions to CLECs in Massachusetts on a UNE-P basis are in staffed central offices.
- (2) Approximately 33% of access lines that Verizon currently provisions to CLECs in Massachusetts on a UNE-P basis are in unstaffed central offices.



**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** John Conroy  
**Title:** Vice President

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-37      What percentage of access lines that Verizon provides to its retail customers in Massachusetts are located in (1) staffed COs and (2) unstaffed CO's? If these two numbers do not sum to 100 percent, please explain why.

**REPLY:**      (1) Approximately 65% of Verizon MA's retail access lines are in staffed central offices.  
                     (2) Approximately 35% of Verizon MA's retail access lines are in unstaffed central offices.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** Julie A. Canny  
**Title:** Executive Director – Wholesale

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-40 Please explain how Verizon’s performance conducting bulk hot cuts is treated under the currently effective Performance Assurance Plan in Massachusetts (“PAP”). Please identify each provision in the PAP upon which Verizon relies for its answer.

**REPLY:** Bulk Hot Cuts do not generally conform to the definition contained in the Carrier-to-Carrier Guidelines in the Glossary and are therefore not treated under the “Hot Cut” metrics in the Mode of Entry, Critical Measures or Special Provisions provisions of the PAP. The glossary in the guidelines contain the following definition: “A coordinated cut-over is the live manual transfer of a VZ end user to a CLEC completed with manual coordination by VZ and CLEC technicians to minimize disruptions for the end user customer. Also known as a Hot Cut. These all have fixed minimum intervals.”

However, many measures contained in the PAP may cover Bulk Hot cuts, as long as they are not excluded via other provisions in the Guidelines (such as appendix S). The list below are measures included in the UNE Loop Mode of Entry that could apply. Those in bold are also included as critical measures. Those with \* are included in a special provision.

<b>OR-1-02-3331</b>	OR-6-03-3331	<b>PR-4-04-3113</b>	MR-4-02-3550
OR-2-02-3331	OR-1-04-3331*	PR-5-01-3112	MR-4-07-3550
OR-4-11-3000	OR-1-06-3331*	PR-5-02-3112	<b>MR-4-08-3550</b>
<b>OR-4-16-3000</b>	OR-2-04-3331*	<b>PR-6-01-3112</b>	<b>MR-5-01-3550</b>
OR-4-17-3000	OR-2-06-3331*	MR-1-01-2000	MR-3-02-3550
OR-5-03-3000 *	<b>PR-4-02-3100</b>	<b>MR-3-01-3550</b>	MR-4-03-3550

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** Retail: David Deisher

CLEC: Artie Zanfini

**Title:** Retail: Manager – Sys Analysis  
& Prog

CLEC: Director – Customer  
Service

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-41 For each day between August 1, 2000 and August 1, 2003, or for the latest period in which this information is available, and for each Verizon central office, please separately provide the number of interLATA and intraLATA PIC changes processed by Verizon.

**REPLY:** Please see attached “MA ATT Exhibit 1-41” detailing the number of PIC Changes performed in Massachusetts from August 1, 2000 forward. PIC Changes described as “Retail” represent changes made for Verizon retail customers. PIC Changes described as “CLEC” represent changes made by Verizon for CLEC customers served using resale and UNE-P products.

The data contained in “MA ATT Exhibit 1-41” is proprietary, confidential and competitively sensitive and is being provided to the Department and to parties in accordance with the terms of the Department’s Protective Order.

VZ # 53

**Verizon New England Inc.**

**d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** John Conroy / John White

**Title:** Vice President / Exec. Director

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-42

For each pair of central offices between which Verizon, in its Initial Panel Testimony, claims that two or more unaffiliated carriers provide transport, please provide the following information each of the identified carriers:

- (a) The number of transport circuits terminating at the carrier's physical collocation facilities;
- (b) If known, the level of each transport circuit terminating at the carrier's physical collocation facilities; and
- (c) Whether Verizon has provided a dark fiber infeasible right-of-use ("IRU") on a long-term basis (10 or more years) to the carrier.

**REPLY:**

- (a) Verizon MA does not have the information requested. The information could only be supplied by the CLEC who owns the facilities.
- (b) Verizon MA does not have the information requested. The information could only be supplied by the CLEC who owns the facilities.
- (c) All of the routes provided in Verizon's Panel Testimony are routes where the fiber optic facilities are non-Verizon facilities; therefore the question is not relevant.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** John Conroy / John White  
**Title:** Vice President / Exec. Director

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-43 Please provide, in manipulable electronic form (e.g., spreadsheets), copies of all source data, exhibits, tables, maps, spreadsheets, programs, and all other supporting data and source materials for Attachments 5 and 6 to Verizon's Initial Panel Testimony regarding Dedicated Transport (dated November 14, 2003).

**REPLY:** Please see Verizon MA's proprietary response to AG 1-9.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** John Conroy / John White  
**Title:** Vice President / Exec. Director

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-44      With regard to the transport routes that Verizon claims in its Initial Panel Testimony regarding Dedicated Transport (dated November 14, 2003) meet the transport triggers specified in the Triennial Review Order, please provide the following information for each carrier that Verizon claims is a wholesale provider of transport:

- (a) All evidence that Verizon has that the carrier actually leases wholesale transport to other carriers; and
- (b) All evidence that Verizon has of the specific routes on which the carrier actually leases such transport to other carriers

**REPLY:** (a) & (b) Verizon MA provided evidence in its direct testimony. Verizon MA will provide its additional evidence in its Supplemental filing.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** John Conroy / John White  
**Title:** Vice President / Exec. Director

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-45 Please provide a table or chart, similar to those provided in Attachment 6, that (1) separately identifies the 81 pairs of wire centers that Verizon says in its Initial Panel Testimony regarding Dedicated Transport (dated November 14, 2003) (p. 36) meet the FCC's wholesale trigger but not the self-provisioning trigger and (2) shows which carriers provide wholesale transport between these paired wire centers.

**REPLY:** See Attachment 6.C of Verizon MA's Direct Testimony. The 81 routes are those routes where the "Count Of CLECs In Common >=3 Self-Providers" column equals "0". Attachments 6.B and 6.B.1 identify the carriers that provide wholesale transport along those routes.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 03-60**

**Respondent:** John Conroy / John White  
**Title:** Vice President / Exec. Director

**REQUEST:** AT&T Set 1

**DATED:** November 25, 2003

**ITEM:** AT&T 1-46

Of the carriers that Verizon has identified as having “deployed fiber transport facilities primarily, if not exclusively, for use by other carriers” Verizon’s Initial Panel Testimony regarding Dedicated Transport (dated November 14, 2003) (p. 36):

- (a) Please provide the names of each of these carriers in addition to those specifically identified on p. 36 of the testimony (i.e., carriers other than NEESCOM, NEON, and Metromedia Fiber).
- (b) Please explain fully why these carriers are counted in Attachment 6 toward both the self-provisioning and the wholesale triggers.

For each of these carriers, please specify all transport routes on which Verizon claims the carrier provides wholesale transport but does *not* count toward the self-provisioning trigger.

**REPLY:**

- (a) Based on information available at the time of Verizon MA’s filing, Verizon MA believes that Fibertech Networks and WilTel Communications also have deployed fiber facilities primarily, if not exclusively, for use by other carriers.
- (b) The FCC’s self-provisioning trigger is met when a route connecting a pair of Verizon MA wire centers has two fiber-based competing carriers and a wholesale provider. Accordingly, Attachments 6.A and 6.A.1 identify all carriers that potentially can be counted to meet the self-provisioning trigger.
- (c) Please see Attachments 6.A, 6.A.1, 6.B and 6.B.1.



